

TERESA DAWN ARMSTRONG,
Plaintiff,
v.
TARGET CORPORATION,
Defendant.

EXHIBIT 1

**IN THE CIRCUIT COURT FOR RUTHERFORD COUNTY, TENNESSEE
AT MURFREESBORO**

TERESA DAWN ARMSTRONG,

Plaintiff,

-vs-

TARGET CORPORATION,

Defendant.

JURY DEMAND

No. 77609

FILED

AUG 18 2020

CLERK
JENNIFER HARRIS
DEPUTY CLERK

COMPLAINT

Comes the Plaintiff Teresa Dawn Armstrong, and brings this suit against the Defendant Target Corporation, and for her cause of action, would state as follows:

1. Plaintiff, Teresa Dawn Armstrong, resides in Rutherford County Tennessee at 118 Markum Drive, LaVergne, TN 37086.
2. Defendant, Target Corporation is a corporate entity doing business in Tennessee, and specifically in Rutherford County, Tennessee and may be served through its registered agent C T Corporation System, 300 Montvue Road, Knoxville, Tennessee 37919-5546..
3. On or about August 30, 2019 Plaintiff Teresa Dawn Armstrong was a patron and business invitee of the Target store at 803 Industrial Blvd., in Smyrna, Rutherford County, Tennessee. Plaintiff was walking down to an aisle marked W19 to pick up detergent. As she turned the corner she slipped in a clear substance which had been negligently left on the floor by the staff of defendant causing her feet to slip out from under her. She fell violently to the floor hitting her left hip and left shoulder on the base deck and her right knee on the floor.
4. An employee on duty of the Target Store came to the scene and filled out an incident report. Ms. Armstrong was transported via ambulance to StoneCrest Medical Center for

emergency treatment with additional orthopaedic treating including surgery and physical therapy and has incurred medical expenses through today's date which are continuing.

5. As a result of Defendant's negligence, Plaintiff Teresa Dawn Armstrong has sustained severe and painful injuries, and has incurred expenditures and obligations for medical and hospital care and attention, and Plaintiff is informed and believes, and on such information and belief alleges that it will be necessary for her in the future to expend further sums for medical care and attention, the exact amount of all such expenses and obligation to be incurred by Plaintiff is to be determined. Further, as a result of Defendant's negligence, Plaintiff has been unable to perform many of the duties she was once able to perform with ease and has sustained a loss of enjoyment of life as a result of the above-mentioned mishap, all of which is continuing.

6. The Defendant, acting through its agents, servants and/or employees was negligent and committed the following acts, omissions or failures to act which constitute acts of common law negligence and which negligent acts directly and proximately caused the injuries and damages to the plaintiff herein, to wit:

(a) Failed to exercise ordinary and reasonable care for the safety of patrons of Target, and particularly plaintiff herein;

(b) Failed to place a sign in that location of the store alerting and/or warning patrons, and specifically the Plaintiff, of dangerous condition existing in that location of the store; and,

(c) By negligently maintaining the premises of the Target Store at 803 Industrial Blvd., Smyrna, TN 37167 when they knew or should have known in the exercise of ordinary care that a clear substance believed to be wet soap was allowed to stand on the floor in the aisle where patrons walk causing the threat of harm to the public and customers such as the Plaintiff, Teresa

Dawn Armstrong.

WHEREFORE, Plaintiff prays:

1. For service of process to issue requiring the Defendant to answer within the time prescribed by law, but the oath to their answer is hereby waived.
2. For judgment damages against the Defendant in an amount which is fair and reasonable, in dollars of the United States as compensation for the personal injuries suffered by the Plaintiff as the proximate result of the negligence of the Defendant, its agents and/or employees.
3. For such other, further and general relief to which the Plaintiff may be entitled.

Respectfully submitted,


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COST BOND

I am surety for costs of this cause as contemplated pursuant to T.C.A. §20-12-120 et seq.


Stanley A. Davis

State of Tennessee, Rutherford County
The undersigned, Circuit Court Clerk of
the said County and State, hereby certifies
that the foregoing is a correct copy of
the instrument filed in the foregoing case
in the Circuit Court of Murfreesboro, Tennessee.
This 18th day of August 2020
MELISSA MARRELL


Deputy Clerk